

EXHIBIT C

and has a corporate headquarters located in St. Louis, Missouri. Accordingly, Defendants have amended the caption to name the correct legal entity.

3. Plaintiff states in his Petition that he is seeking monetary relief that exceeds the amount in controversy requirement for removal. *See* Plaintiff's Original Petition at ¶ 32, attached as Exhibit A to Index of Documents filed with Defendants' Notice of Removal (alleging that Defendants have failed to pay sales commissions owed in the amount of \$222,000.00).

4. Defendants were served with a copy of the Summons and Complaint on September 18, 2018. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is timely filed within 30 days of receipt of the Petition.

5. On October 12, 2018, Defendants filed their Answer generally denying Plaintiff's claims and asserting various affirmative defenses.

6. At the time of the commencement of this action and at the time of removal, Plaintiff is a citizen of Dallas County, Texas and is therefore a citizen of Texas.

7. At the time of the commencement of this action and at the time of removal, Defendant Spectrum Gulf Coast LLC is a limited liability company organized under the laws of Delaware with its principle office located at 12405 Powerscourt Drive, St. Louis, Missouri 63131, and therefore is a citizen of Delaware and Missouri.

8. At the time of the commencement of this action and at the time of removal, Defendant Charter Communications, LLC is a limited liability company organized under the laws of Delaware with its principle office located at 12405 Powerscourt Drive, St. Louis, Missouri 63131, and therefore is a citizen of Delaware and Missouri.

9. Accordingly, this Court has jurisdiction over this action, and the action is removable because (1) Plaintiff has alleged an amount in controversy that exceeds \$75,000, and (2) complete diversity exists. 28 U.S.C. § 1332(a).

10. Venue is proper in this district pursuant to 28 U.S.C. § 1441(a) because the state court where the suit is pending is located in this district.

11. Defendants state that this removal is well grounded in fact, warranted by existing law, and not interposed for any improper purpose.

12. Concurrent with this filing of this notice, Defendants are serving this notice upon Plaintiff's counsel and filing a copy of the notice with the Clerk of Court of the District Court of Dallas County, Texas.

13. Pursuant to Local Rule 81.1, Defendants file its Civil Cover Sheet and its Supplemental Cover Sheet contemporaneously herewith. Defendants also file the following documents: (1) Defendants' Certificate of Interested Persons; (2) and index of all documents that clearly identifies each document and indicates the date the document was filed in state court; (3) a copy of the docket sheet in the State Court Action, attached to Defendants' Index as Exhibit H; and (4) each document filed in the State Court Action attached to Defendants' Index as Exhibits A–G.

14. Plaintiff demanded a jury in the State Court Action.

WHEREFORE, Defendants remove this action from the 193rd District Court of Dallas County, Texas to the United States District Court for the Northern District of Texas, Dallas Division and respectfully request that this Court assume full jurisdiction over this action.

Dated: October 15, 2018

Respectfully submitted,

/s/ Paulo B. McKeeby

Paulo B. McKeeby

TX State Bar No. 00784571

Michael A. Correll

TX State Bar No. 24069537

Aimee M. Raimer

TX State Bar No. 24081275

MORGAN, LEWIS & BOCKIUS LLP

1717 Main Street, Suite 3200

Dallas, TX 75201

Tel: 214-466-4000

Fax: 214-466-4001

paulo.mckeeby@morganlewis.com

michael.correll@morganlewis.com

aimee.raimer@morganlewis.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served upon all counsel of record via the Court's CM/ECF System on this 15th day of October, 2018, as follows:

Christine Neill

Jane Legler Byrne

Neill & Byrne, PLLC

3141 Hood Street, Suite 310

Dallas, TX 75219

cneill@neillbyrnelaw.com

jleglerbyrne@neillbyrnelaw.com

/s/ Paulo B. McKeeby

Paulo B. McKeeby

United States District Court
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

DYLAN KROHN

v.

SPECTRUM GULF COAST, LLC, et al.

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CASE NO. 3:18-CV-2722-S


ORDER

On October 15, 2018, Defendants Spectrum Gulf Coast, LLC and Charter Communications, LLC removed the above-captioned case to this Court on the basis of federal diversity jurisdiction [ECF No. 1]. Defendants failed to state that all of the members of Spectrum Gulf Coast and Charter Communications, both of which are LLCs, are diverse from Plaintiff such that the Court has diversity jurisdiction over the action. Accordingly, this Court requires Defendants to show cause in writing why the Court should not remand the case for want of jurisdiction.

Defendants shall have thirty (30) days from the date of this Order to show cause in writing why the Court should not remand the case for want of jurisdiction.

SO ORDERED.

SIGNED October 22, 2018.



KAREN GREN SCHOLER
UNITED STATES DISTRICT JUDGE

which is a limited liability company organized under the laws of Delaware with its principle office located in Missouri.

4. At the time of the commencement of this action and at the time of removal, the 100% sole member of Defendant Charter Communications, LLC is Charter Communications Operating, LLC, which, as indicated above, is a limited liability company organized under the laws of Delaware with its principle office located in Missouri.

5. At the time of the commencement of this action and at the time of removal, the 100% sole member of Charter Communications Operating, LLC is CCO Holdings, LLC, which is a limited liability company organized under the laws of Delaware with its principle office located in Missouri.

6. At the time of the commencement of this action and at the time of removal, the 100% sole member of CCO Holdings, LLC is CCH II, LLC, a limited liability company organized under the laws of Delaware with its principle office located in Missouri.

7. At the time of the commencement of this action and at the time of removal, the 100% sole member of CCH II, LLC is CCH I, LLC, a limited liability company organized under the laws of Delaware with its principle office located in Missouri.

8. At the time of the commencement of this action and at the time of removal, the 100% sole member of CCH I, LLC is CCH I Holdings, LLC, a limited liability company organized under the laws of Delaware with its principle office located in Missouri.

9. At the time of the commencement of this action and at the time of removal, the 100% sole member of CCH I Holdings, LLC is CCHC, LLC, a limited liability company organized under the laws of Delaware with its principle office located in Missouri.

10. At the time of the commencement of this action and at the time of removal, the 100% sole member of CCHC, LLC is Charter Communications Holding Company, LLC, a limited liability company organized under the laws of Delaware with its principle office located in Missouri.

11. At the time of the commencement of this action and at the time of removal, the members of Charter Communications Holding Company, LLC are Charter Communications, Inc., a publicly held Delaware corporation with its principal place of business in Connecticut, and Charter Investment, Inc., a privately held Delaware corporation with its principle office located in Washington.

12. The LLC entities listed above are all indirect subsidiaries of and managed by Charter Communications, Inc.

13. Based on the foregoing, all of the members of Defendant Spectrum Gulf Coast, LLC and Defendant Charter Communications, LLC are diverse from Plaintiff, who is a citizen of Texas.

14. Accordingly, this Court has jurisdiction over this action, and the action is removable because (1) Plaintiff has alleged an amount in controversy that exceeds \$75,000, and (2) complete diversity exists. 28 U.S.C. § 1332(a).

WHEREFORE, Defendants respectfully request that this Court assume full jurisdiction over this action.

Dated: November 20, 2018

Respectfully submitted,

/s/ Paulo B. McKeeby

Paulo B. McKeeby

TX State Bar No. 00784571

Michael A. Correll

TX State Bar No. 24069537

Aimee M. Raimer

TX State Bar No. 24081275

MORGAN, LEWIS & BOCKIUS LLP

1717 Main Street, Suite 3200

Dallas, TX 75201

Tel: 214-466-4000

Fax: 214-466-4001

paulo.mckeeby@morganlewis.com

michael.correll@morganlewis.com

aimee.raimer@morganlewis.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served upon all counsel of record via the Court's CM/ECF System on this 20th day of November, 2018, as follows:

Christine Neill
Jane Legler Byrne
Neill & Byrne, PLLC
3141 Hood Street, Suite 310
Dallas, TX 75219
cneill@neillbyrnelaw.com
jleglerbyrne@neillbyrnelaw.com

/s/ Paulo B. McKeeby
Paulo B. McKeeby